

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
SOMPO JAPAN INSURANCE COMPANY :
OF AMERICA, :

Plaintiff, :

07-CV-6476 (JGK) (THK)

-against- :

HANKYU EXPRESS INTERNATIONAL CO., :
LTD., and KOREAN AIR LINES CO., LTD., :

Defendants. :

RULE 26 DISLCOSURES OF
THIRD-PARTY DEFENDANT
INTERNATIONAL CARGO
MARKETING CONSULTANTS, INC.

----- X
KOREAN AIR LINES CO., LTD., :

Third-Party Plaintiff, :

-against- :

INTERNATIONAL CARGO MARKETING :
CONSULTANTS, INC. d/b/a Alliance Airlines, :

Third-Party Defendant. :

----- X

Third-Party Defendant International Cargo Marketing Consultants, Inc. d/b/a Alliance
Airlines, ("Alliance"), by and through its attorneys Schindel, Farman, Lipsius, Gardner &
Rabinovich, LLP, pursuant to Rule 26 of the Federal Rules of Civil Procedure, hereby provides
the following Initial Disclosures:

DISCLOSURE NO. 1:

The name and, if known, the address and telephone number of each individual likely to
have discoverable information.

RESPONSE TO DISCLOSURE NO. 1:

Alliance states that the following people may have discoverable information relating to this matter:

1. All persons named by other parties in Rule 26 Disclosures.
2. Jong Dae Lee, Claim Manager of Alliance
3. Personnel of Alliance who handled the cargo.
4. Personnel of ATL Couriers/ATL Express who received the subject cargo from Alliance and delivered it to the consignee.
5. David Carey, believed to be an employee of Unisia of Georgia, who received the cargo at destination.

DISCLOSURE NO. 2:

A copy, or a description by category and location, of all documents, data compilations, and tangible things.

RESPONSE TO DISCLOSURE NO. 2:

See document attached hereto as Exhibit "A".

DISCLOSURE NO. 3:

A computation of any category of damages claimed by the disclosing party.

RESPONSE TO DISCLOSURE NO. 3:

Not applicable.

DISCLOSURE NO. 4:


Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment.

RESPONSE TO DISCLOSURE NO. 4:

The liability of Alliance for loss of and damage to cargo is insured under policy no. I20795773001 issued by Ace Insurance Company of Illinois.

Dated: January 24, 2008
New York, New York

SCHINDEL, FARMAN, LIPSIOUS,
GARDNER & RABINOVICH, LLP
Attorneys for Third-Party Defendant
International Cargo Marketing
Consultants, Inc. d/b/a Alliance Airlines

By: 
Edward Farman (EF7329)
14 Penn Plaza, Suite 500
New York, New York 10122
Telephone No.: (212) 563-1710
File No.: 2665.0019

TO: Thomas M. Eagan, Esq.
Maloof Browne & Eagan LLC
411 Theodore Freund Avenue
Rye, New York 10580
Attorneys for Plaintiff

Kevin J. Philbin, Esq.
Mendes & Mount, LLP
750 Seventh Avenue
New York, New York 10019
Attorneys for Defendant Hankyu Express International Co., Ltd.

Andrew J. Harakas, Esq.
Clyde & CO US LLP
The Chrysler Building
405 Lexington Avenue
New York, New York 10174
Attorneys for Defendant/Third-Party Plaintiff Korean Air Lines Co., Ltd.

Francis A. Montbach, Esq.
Mound Cotton Wollan & Greengrass
One Battery Park Plaza
24 Whitehall Street
New York, New York 10004
Attorneys for Third-Party Defendant Delta Air Lines, Inc.